EPA REGISTRATION NUMBER 91127-4

PROCESSING REQUEST

Reg # 91127-4	Decision # 513542
Description: New Basic CSF	- deted 1/20/2016
Electronic Label & Letter (see PPLS):	Non Electronic R Label & Letter (Scanning required):
☐ Dated:	□ Dated:
***Only one label ty	pe should be selected* F*
Other Materials Sent (see New CSF(s) Dated: 1/20/20	·
Other:	
and clipped together, NOT STAPLED. The materials to staff in the Information Servi	, please file materials in a new jacket and
Reviewer: Tim Ciarlo	
Division: RD/1031	
Phone: 703-347-8082	Date: 12/20/2016



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

91127-4

Date of Issuance:

EPA Reg. Number:

12/20/16

NOTICE OF PESTICIDE:

X Registration

Reregistration (under FIFRA, as amended) Term of Issuance: Conditional

Name of Pesticide Product:

EXT Lambda-Cyhalothrin TGAI

Name and Address of Registrant (include ZIP Code):

James M. Wagner Agent for Extremis, LLC Extremis, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/registration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Date:

12/20/16

Kable Bo Davis, Product Manager 03

Invertebrate & Vertebrate Branch 1, Registration Division (7505P)

Page 2 of 2 EPA Reg. No. 91127-4 Decision No. 513542

2. You are required to comply with the data requirements described in the DCIs identified below:

a. Lambda-cyhalothrin GDCI-128897-1104 GDCI-128897-1151 GDCI-128897-1249

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCIs listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: http://www.epa.gov/pesticide-contacts/contacts-office-pesticide-programs-pesticide-re-evaluation-division

- The data requirements for storage stability (Guideline 830.6317) are not satisfied. A one year study is required to satisfy these data requirements. You have 18 months from the date of registration to provide these data.
- 4. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 91127-4."
- Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

Basic CSF dated 01/20/2016

If you have any questions, please contact Tim Ciarlo by phone at 703-347-8082, or via email at Ciarlo. Timothy@epa.gov.

EXT Lambda-Cyhalothrin TGAI

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT: %	BY WT.
Lambda-cyhalothrin	
$[1\alpha(S^*), 3\alpha(Z)]$ -±-cyano-(3-phenoxyphenyl)methyl-3-(2-chloro-3,3,3-trifluoro-1-propenyl]-2,2-	
dimethylcyclopropanecarboxylate	98.82%
OTHER INGREDIENTS:	1.18%
TOTAL:	100.00%

KEEP OUT OF REACH OF CHILDREN WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

	FIRST AID
IF ON SKIN OR CLOTHING:	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.
IF INHALED:	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF IN EYES:	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
treatment.	HOTLINE NUMBER container or label with you when calling a poison control center or doctor, or going for MERGENCY MEDICAL ASSISTANCE CALL: 1-844-685-9173

Refer to side panel for additional precautionary statements

For Chemical Emergency
Spill, Leak, Fire, Exposure, or Accident
Call CHEMTREC Day or Night
Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)

Net	Weig	ht.		
1406				

EPA Reg. No. 91127-xx EPA Est. No.

ACCEPTED

12/20/2016

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 24407

91127-4

Manufactured For:

Extremis, LLC 1204 Village Market Place #273 Morrisville, NC 27560

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

May be fatal if absorbed through skin. May be fatal if inhaled. Causes skin irritation. Harmful if swallowed. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wear long-sleeved shirt and long pants, socks, chemical-resistant footwear and gloves, and goggles or full face shield. Do not breathe vapors. Do not get in on skin, on clothing, or in eyes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

For handling activities, use a NIOSH approved particulate filter with any N, R, P filter with NIOSH approval number prefix TC-84A; or a NIOSH approved powered air purifying respirator with an HE filter with NIOSH approval number prefix TC-21C.

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, then use detergent and hot water. Keep and wash PPE separately from other laundry. When mixing and loading, a chemical-resistant apron is recommended.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your Regional Office of the Environmental Protection Agency.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

FOR FORMULATING USE ONLY DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Only for formulation into an insecticide for:

(1) TERRESTRIAL AND AQUATIC FOOD: Alfalfa; Barley; Brassica (head and stem); Buckwheat; Canola; Corn (field, pop, seed and sweet); Cotton; Cucurbit Vegetables; Fruiting Vegetables; Garlic; Grass, Forage, Fodder, and Hay; Legume Vegetables; Lettuce (head and leaf); Oats; Onion (dry bulb); Peanuts; Pome Fruit; Rice; Wild Rice; Rye; Sorghum; Stone Fruit; Sugarcane; Sunflower; Tree Nuts; Triticale; Tuberous and Corm Vegetables; and Wheat.

TERRESTRIAL NON-FOOD: Non-crop lands (excluding public land); Tobacco (burley and flue-cured).

FORESTRY: Conifer and Deciduous trees (plantations, nurseries and seed orchards)

NON-DOMESTIC INDOOR AND OUTDOOR

NON-FOOD GREENHOUSE AND NURSERIES

- (2) Uses for which US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration;
- (3) Uses for experimental purposes that are in compliance with US EPA requirements. Manufacturer disclaims liability for claims in damages resulting from any use of a formulated product in a manner or on a crop not specifically listed on this label.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE INSTRUCTIONS:

Store in a cool, dry area. Do not store in a manner where cross-contamination with other pesticides, fertilizers, food or feed could occur. Keep container closed when not in use. Store in original container and out of the reach of children, preferably in a locked storage area. In case of a spill or leak on floor or paved surface, soak up with synthetic absorbent. Remove to chemical waste area.

PESTICIDE DISPOSAL INSTRUCTIONS:

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: BAGS: Nonrefillable container. Do not reuse or refill this container. After bag has been emptied, offer for recycling, if available, or dispose of empty bag in a sanitary landfill or by incineration or, if allowed by State and local authorities, by burning. If burned, stay out of smoke. SUPERSACK BAGS: Nonrefillable container. Do not reuse or refill this container. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of inner liner in sanitary landfill or by incineration if allowed by State and local authorities. If outer bag is contaminated and cannot be reused, dispose of in the same manner, or offer outer bag for recycling, if available. PLASTIC TOTES/DRUMS: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Warranty and Disclaimer Statement

The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Extremis, LLC, and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the product, or other unintended consequences. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

Extremis, LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to Extremis, LLC, and is subject to the inherent risks described above.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, EXTREMIS, LLC DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, EXTREMIS, LLC, MANUFACTURER, AND SELLER DISCLAIM AND SHALL NOT BE LIABLE FOR ANY SPECIAL, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE, HANDLING, APPLICATION, STORAGE, OR DISPOSAL OF THIS PRODUCT OR FOR DAMAGES IN THE NATURE OF PENALTIES, AND THE USER AND BUYER WAIVE ANY RIGHT THAT THEY MAY HAVE TO SUCH DAMAGES. NO AGENT, REPRESENTATIVE OR EMPLOYEE OF EXTREMIS, LLC IS AUTHORIZED TO MAKE ANY WARRANTY, GUARANTEE OR REPRESENTATION BEYOND THOSE CONTAINED HEREIN OR TO MODIFY THE WARRANTIES CONTAINED HEREIN. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE TOTAL LIABILITY OF EXTREMIS, LLC, MANUFACTURER, AND SELLER, SHALL BE LIMITED TO THE PURCHASE PRICE PAID, OR AT EXTREMIS, LLC'S ELECTION, THE REPLACEMENT OF THE PRODUCT.

Please read instructions on reverse before complg form.	For	m Appro	ved. Unio No.	2070-00	60. Approval expires 05-31-98		
United S	late	1	Registra	ition	OPP Identifier Number		
SEPA Environmental Pro	18110	1	Amend	nent	1		
Washington, I		-	Other				
		notio					
1. Company/Product Number	2. EPA Product			13 F	Proposed Classification		
91127-XX	Kable Bo David	waning		1	Topocoo o documento.		
4. Company/Product (Name)	PM#			\dashv			
Extremis, LLC / EXT Lambda-Cyhalothrin TGAI	3			×	None Restricted		
5. Name and Address of Applicant (Include Zip Code					FIFRA Section 3(c)(3)		
Extremis LLC		t is sim	ilar or identic	al in cor	mposition and labeling		
c/o Wagner Regulatory Associates, Inc.	to: EPA Reg. No. 10	0-1435	5				
P.O. Box 640 Hockessin, DE 19707	Product Name: 1	ambda	a-Cyhalothrin	Technic	cal 2		
☐ Check if this is a new address	Trouder Hame.	Lumbac	z Gynaioanin	100,111	and a		
	Section - II		1				
Amendment - Explain below.			s in response t	0			
Resubmission in response to Agency letter dated_	Agency let						
Notification - Explain below.	Other - Ex	plain be	low.				
Explanation: Use additional page(s) if necessary. (F	or Section I and Section II.)	-					
PRIA CODE: R334							
	Section - III	_					
1. Material This Product Will Be Packaged In:							
Child-Resistant Packaging Unit Packaging	Water Soluble Pack	aging	2. Type of		ier		
	Yes X No		1	Metal Plastic			
	101	, per	X	Glass			
		ntainer		Paper			
be submitted				3. A. M. (1995)	(Specify) HDPE lined bags		
		- 12					
	. Size(s) Retail Container	5.	Location of		pirections		
X Label Container	Bulk sizes		X On La		accompanying product		
Manner in Which Label is Affixed to Product	Lithograph		Otheradh	esive ba	acked label		
	X Paper glued Stenciled						
	Section - IV						
Contact Point (Complete items directly below for id.)		onlacte	d. if necessa	ry, to pr	rocess this application.)		
Name Title			Telepho	ne No.	(Include Area Code)		
James M. Wagner Agent Certifica	for Extremis, LLC		(302) 63	6 Dat	e Application		
I certify that the statements I have made on this form and a	I attachments thereto are true, acc				ceived		
I acknowledge that any knowingly false or misleading states both under applicable law.	nent may be punishable by fine or	imprisor	ment or		(Stamped)		
2 Signature	3. Title				(4.0		
Comes M Wagner-	Agent for Extremis, LLC						
	Email: jmw@wagnerreg.com	**************************************					
	5. Date				İ		
ames M. Wagner January 20th, 2016							

This is a reproduction of EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

Submitted Electronically

January 20th, 2016

Document Processing Desk (REGFEE)
ATTN: Mr. Kable Bo Davis, PM Team 3
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



Dear Mr. Davis;

Subject: Extremis, LLC, Company No. 91127

Product: "EXT Lambda-Cyhalothrin TGAI" (Lambda-Cyhalothrin)
Application to register a new manufacturing use product (PRIA R334)

Wagner Regulatory Associates, Inc., as agent for Extremis, LLC, is requesting registration of the above referenced product containing the currently registered active ingredient Lambda-Cyhalothrin (PC code 128897).

In support of this application, the following documents and studies are being submitted electronically via the EPA CDX PSP portal.

- Letter from Extremis, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confirmation of payment of PRIA fee for category R334 (\$19,838)
- Confidential Statement of Formula (8570-4)
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix (internal and public) (8570-35)
- Data Transmittal Document
- Supporting data reports as listed in the transmittal document
- Draft product labeling

James M. Wagner

If you have any questions about this submission please contact the undersigned at 302-635-7290 or at email address james@wagnerreg.com.

Sincerely,

James M. Wagner

Agent for Extremis, LLC

Enclosures

DATA TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Extremis, LLC c/o Wagner Regulatory Associates PO Box 640 Hockessin, DE 19707

2. Regulatory Action In Support Of Which This Package Is Submitted

Application for Registration EXT Lambda-Cyhalothrin TGAI

3. Transmittal Date

January 20th, 2016

4. List of Submitted Studies

49812501	Lambda Cyhalothrin TGAl: Product Chemistry – Group A Product Identity and Composition, Description of Materials, Description of Manufacturing Process, Discussion of Formation of Impurities, EPA Guidelines: 830.1550, 830.1600, 830.1620, 830.1670
49812502	Lambda Cyhalothrin TGAI: Complete Analysis of Five Batch Samples, Study No. CH - 051/2015, EPA Guidelines: 830.1700
49812503	Lambda Cyhalothrin TGAI: Screening for Impurities Content in Five Batch Samples, Study No. CH - 050/2015, EPA Guideline: 830.1700
49812504	Lambda Cyhalothrin TGAI: Spectroscopic Characterization of Five Batch Samples, Study No. CH - 052/2015, EPA Guideline: 830.1700
49812505	Lambda Cyhalothrin TGAI: Validation of the Analytical Method for the Determination of the Active Ingredient Content, Study No. CH - 048/2015, EPA Guidelines: 830,1800
49812506	Lambda Cyhalothrin TGAI: Validation of the Analytical Method for the Determination of the Significant Impurities Content, Study No. CH - 049/2015, EPA Guidelines: 830.1800
49812507	Lambda Cyhalothrin TGAI: Determination of the Color, Physical State, and Odor, Study No. CH - 632/2015, EPA Guidelines: 830.6302, 830.6303, 830.6304
49812508	Lambda Cyhalothrin TGAI: Determination of the Chemical Compatibility (Corrosivity Test), Study No. CH - 637/2015, EPA Guidelines: 830.6314
49812509	Lambda Cyhalothrin TGA1: Determination of the pH Value, Study No. CH - 633/2015, EPA Guideline: 830.7000
49812510	Lambda Cyhalothrin TGAI: UV/Vis Spectra, Study No. CH - 641/2015, EPA Guideline 830.7050
49812511	Lambda Cyhalothrin TGAI: Determination of the Melting Point, Study No. CH - 635/2015, EPA Guideline: 830.7200
49812512	Lambda Cyhalothrin TGAI: Determination of the Boiling Point, Study No. CH - 636/2015, EPA Guideline: 830.7220
49812513	Lambda Cyhalothrin TGAI: Determination of the Relative Density, Study No. CH - 634/2015, EPA Guideline: 830.7300
49812514	Lambda Cyhalothrin TGAI: Determination of the Partition Coefficient, Study No. CH - 639/2015, EPA Guideline: 830.7550
49812515	Lambda Cyhalothrin TGAI: Determination of the Water Solubility and the Solubility in Organic Solvents, Study No. CH - 638/2015, EPA Guideline: 830.7840
49812516	Lambda Cyhalothrin TGAI: Determination of the Vapor Pressure, Study No. CH - 640/2015, EPA Guideline: 830.7950
49812517	Lambda Cyhalothrin TGAI: Product Chemistry – Group B: Certified Limits and Open Literature Citation and request for Waiver for Certain Physical / Chemical Properties Data, Study No. N/A, EPA Guideline 830.1750; 830.6313; 830.6314, 830.6315, 830.6316, 830.6317; 830.6319; 830.6320; 830.6321; 830.7100; 830.7370; 830.7520

Company Official:		0 1.11
	James M. Wagner	James M Wagner
	Authorized Agent	Signature
Company Name:	Extremis, LLC	
Company Contact:		
	James M. Wagner	(302) 635-7290
	Authorized Agent	Phone



November 8, 2015

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that James Wagner of Wagner Regulatory Associates, Inc. are authorized to act as agent for Extremis, LLC. (EPA Company Number 91127), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Burtle Hedrud

Brooke Hedrick

Regulatory Manager & Project Management

Extremis, LLC

cc: Wagner Regulatory Associates, Inc.

Certification with Respect to Label Integrity

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
91127-XX	01/20/2016	91127.xxxxx.20160120.V1

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

January 20th, 2016 Date

James M. Wagner Name (typed)

Agent for Extremis, LLC Title



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of informati and 0.25 hours per response for reregistration and special review activities, including time for comments regarding burden estimate or any other aspect of this collection of information, including Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Averto this address.	reading the instruction uding suggestions for	as and completing the necessary forms. Send reducing the burden to: Director, Collection
Certification with Respect to C	Citation of Data	
Applicant's/Registrant's Name, Address, and Telephone Number Extremis, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640, Hockessin, D.	DE 19707	EPA Registration Number/File Symbol 91127-U
Active Ingredient(s) and/or representative test compound(s) Lambda Cyhalothrin Technical		Date December 20, 2016
General Use Pattern(s) (list-all those claimed for this product using 40 CFR Part 158 Terrestrial Food Crop, Terrestrial Nonfood Crop)	Product Name EXT Lambda-Cyhalothrin TGAI
NOTE: If your product is a 100% repackaging of another purchased EPA-registere submit this form. You must submit the Formulator's Exemption Statement (EPA Formulator's Exemption Statement)	ed product labeled for 8570-27).	or all the same uses on your label, you do not need to
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	ent offers of compensation (the Data Matrix form should
SECTION I: METHOD OF DATA SUPP	PORT (Check one n	nethod only)
I arn using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	under the	g the selective method of support (or cite-all option e selective method), and have included with this form a d list of data requirements (the Data Matrix form must be
SECTION II: GENERAL	OFFER TO PAY	
[Required if using the cite-all method or when using the cite-all option under the selection of the cite-all option of the selection of the cite-all option of the cite-all option under the selection.] I hereby offer and agree to pay compensation, to other persons, with regard to		
SECTION III: CERT	IFICATION	
I certify that this application for registration, this form for reregistration, or the application for registration, the form for reregistration, or the Data-Call-In response. In indicated in Section I, this application is supported by all data in the Agency's files that substantially similar product, or one or more of the ingredients in this product; and (2) requirements in effect on the date of approval of this application if the application souguses. I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	addition, if the cite- t (1) concern the pri is a type of data tha tht the initial registra	all option or cite-all option under the selective method is operies or effects of this product or an identical or twould be required to be submitted under the data ation of a product of identical or similar composition and
I certify that for each study cited in support of this registration or reregistratic submitter; (b) I have obtained the permission of the original data submitter to use the scompensation have expired for the study; (d) the study is in the public literature; or (e) offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c) amount and terms of compensation, if any, to be paid for the use of the study. I certify that in all instances where an offer of compensation is required, cop accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be evidence to the Agency upon request, I understand that the Agency may initiate action FIFRA.	study in support of t I have notified in wi c)(2)(B) of FIFRA; a ties of all offers to p be submitted to the	his application; (c) all periods of eligibility for iting the company that submitted the study and have nd (ii) to commence negotiations to determine the ay compensation and evidence of their delivery in Agency upon request. Should I fail to produce such
I certify that the statements I have made on this form and all attachm knowingly false or misleading statement may be punishable by fine or impriso		
Signature James M. Wagner_	Date 12/20/2016	Typed or Printed Name and Title James M. Wagner, Agent

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.





WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX Date: December 20, 2016 EPA Reg No./ File Symbol: 91127-U Applicant's/Registrant's Name and Address: Extremis, LLC c/o Wagner Regulatory Associates Inc. Product: EXT Lambda-Cyhalothrin TGAI Ingredient: Lambda Cyhalothrin Ingredient: Lambda Cyhalothrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					-
830 Series Group A	Product Identity, Materials, Production Process, Impurities	49812501	Extremis, LLC	Own	
830.1700	Preliminary Analysis	49812502 49812503 49812504	Extremis, LLC	Own	
830.1750	Certified limits	49812517	Extremis, LLC	Own	11 12 = 2
830.1800	Enforcement Analytical Method	49812505 49812506	Extremis, LLC	Own	1
830.6302, 830.6303, 830.6304	Color, Odor, Physical State	49812507	Extremis, LLC	Own	
830.6313	Stability to normal and elevated temperatures	49812517	Extremis, LLC	Own	
830.6314	Chemical Incompatibility	49812508	Extremis, LLC	Own	
830.6315	Flammability	49812517	Extremis, LLC	Own	
830.6316	Explodability	49812517	Extremis, LLC	Own	
830.6317	Storage stability	49812517	Extremis, LLC	Own	
830.6319	Miscibility	49812517	Extremis, LLC	Own	-
830.6320	Corrosion characteristics	49812517	Extremis, LLC	Own	-
830.6321	Dielectric breakdown voltage	49812517	Extremis, LLC	Own	4
830.7000	рН	49812509	Extremis, LLC	Own	
830.7050	UV-Visible Absorption	49812510	Extremis, LLC	Own	1
830.7100	Viscosity	49812517	Extremis, LLC	Own	-
830.7200	Melting Point	49812511	Extremis, LLC	Own	-
830.7220	Boiling Point	49812512	Extremis, LLC	Own	-
830.7300	Density	49812513	Extremis, LLC	Own	-
830.7370	Dissociation constant in water	49812517	Extremis, LLC	Own	
	Particle size, fiber diameter and particle distribution	49812517	Extremis, LLC	Own	-

Signature James M Whigher_	Name and Title James M. Wagner, Agent for Extremis, LLC	Date December 20, 2016
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Extremis, LLC

P.O. Box 640 Hockessin, DE 19707

DATA MATRIX EPA Reg No./ File Symbol: 91127-U Page 2 of 10 Product: EXT Lambda-Cyhalothrin TGAI c/o Wagner Regulatory Associates Inc.

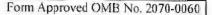
Ingredient: Lambda Cyhalothrin

Applicant's/Registrant's Name and Address:

Date: December 20, 2016

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7550	Octanol Water Partition Coefficient	49812514	Extremis, LLC	Own	
830.7840	Solubility in Water and Organic Solvents	49812515	Extremis, LLC	Own	
830.7950	Vapor Pressure	49812516	Extremis, LLC	Own	
835.1230	Adsorption/Desorption	40052406 40052407 44861503 44861504 44861509	Syngenta Crop Protection	Old	
835.1240	Leaching	40052407	Syngenta Crop Protection	Old	
835.1410	Volatility Laboratory			Gap	Footnote 1.
835.2130	Hydrolysis	00151604	Syngenta Crop Protection	Old	
835.2240	Aqueous Photolysis	44861501	Syngenta Crop Protection	Old	
835.2410	Soil Photolysis	40052405	Syngenta Crop Protection	Old	
835.4100	Aerobic Soil Metabolism	44861504	Syngenta Crop Protection	Old	
835.4200	Anaerobic Soil Metabolism	00151607 44861504	Syngenta Crop Protection	Old	
835.4300	Aerobic Aquatic Metabolism	44367402	Syngenta Crop Protection	Old	
835,4400	Anaerobic Aquatic Metabolism	44367401	Syngenta Crop Protection	Old	
835.6100	Terrestrial Field Dissipation	40052407 40515901	Syngenta Crop Protection	Old	
835.6200	Aquatic Field Dissipation	44367403 44367404	Syngenta Crop Protection	Old	

Signature	O. de Illiance	Name and Title	Date
	James M. Wagner	James M. Wagner, Agent for Extremis, LLC	December 20, 2016





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Date: December 20, 2016 Applicant's/Registrant's Name and Address: Extremis, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 EPA Reg No./File Symbol: 91127-U Page 3 of 10 Product: EXT Lambda-Cyhalothrin TGA1

Guideline Reference Number Guideline Study Name MRID Number Submitter Status Note 850.1010 Freshwater Invertebrate Acute Toxicity 43908811 Syngenta Crop Protection Old 850.1025 Oyster Acute Toxicity 00152728 Syngenta Crop Protection Old 850.1035 Saltwater Crustacean Toxicity - Shrimp 00152729 Syngenta Crop Protection Old 850.1075 Freshwater Fish Acute Toxicity - Trout 00152738 Syngenta Crop Protection Old 43908813 850.1075 Freshwater Fish Acute Toxicity - Bluegill 43908812 Syngenta Crop Protection Old 850.1075 Saltwater Fish Acute Toxicity - Sheepshead minnow 00073989 Syngenta Crop Protection Old 850.1300 Freshwater Invertebrate Life Cycle 41217501 Syngenta Crop Protection Old 850.1350 Saltwater Invertebrate Life Cycle Gap Footnote 1. 850.1400 Freshwater Fish Early Life-Stage Gap Footnote 1. 850.1400 Saltwater Fish Early Life-Stage 00073989 Syngenta Crop Protection Old 850.1500 Fish Life Cycle 41016101 Syngenta Crop Protection Old 41519001 850.1730 Fish Bioconcentration 00152745 Syngenta Crop Protection Old 00152746 850.2100 Avian Oral Toxicity - Mallard Duck 00259807 Syngenta Crop Protection Old 850.2100 Avian Oral Toxicity - Bobwhite Quail Gap Footnote 1. 850.2100 Avian Oral Toxicity - Passerine spp. Gap Footnote 3. 850.2200 Avian Dietary Toxicity - Bobwhite Quail 00259807 Syngenta Crop Protection Old 850.2200 Avian Dietary Toxicity - Mallard Duck 00151595 Syngenta Crop Protection Old 850.2300 Avian Reproduction - Bobwhite Quail 00073989 Syngenta Crop Protection Old 850.2300 Avian Reproduction - Mallard Duck 41512101 Syngenta Crop Protection Old 850.3020 Honey Bee Acute Contact Toxicity 40052409 Syngenta Crop Protection Old

Signature Janus M Wagner	Name and Title James M. Wagner, Agent for Extremis, LLC	Date December 20e 2016
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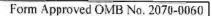
Date: December 20, 2016 Applicant's/Registrant's Name and Address: Extremis, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 EPA Reg No./File Symbol: 91127-U Page 4 of 10 Product: EXT Lambda-Cyhalothrin TGAI

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Non-guideline	Honey Bee Acute Oral Toxicity	40052409 40436302 40436303	Syngenta Crop Protection	Old	
Non-guideline	Honey Bee Chronic Oral Toxicity - Adults			Gap	Footnote 1.
Non-guideline	Honey Bee Chronic Oral Toxicity - Larvae			Gap	Footnote 1.
850.4100	Seedling Emergence and Growth			Gap	Footnote 3.
850.4150	Vegetative Vigor			Gap	Footnote 3.
850.4400	Aquatic Plant Toxicity Lemna spp.			Gap	Footnote 3.
850.4500	Algal Toxicity with Green Algae			Gap	Footnote 3.
850.4500	Algal Toxicity with Freshwater diatom			Gap	Footnote 3.
850.4500	Algal Toxicity with Saltwater diatom			Gap	Footnote 3.
870.1100	Acute Oral Toxicity - rat	48601003	Syngenta Crop Protection	Pay	
870.1200	Acute Dermal Toxicity - rat	48601004	Syngenta Crop Protection	Pay	
870.1300	Acute Inhalation Toxicity - rat	48601005	Syngenta Crop Protection	Pay	
870.2400	Eye Irritation - rabbit	48601006	Syngenta Crop Protection	Pay	
870.2500	Skin Irritation - rabbit	48601007	Syngenta Crop Protection	Pay	
870.2600	Skin Sensitization	48601008	Syngenta Crop Protection	Pay	
8703100	Oral Subchronic – mouse	00154806 43241901	Syngenta Crop Protection	Old	
870.3100	Oral Subchronic – rat	00153028 00154805	Syngenta Crop Protection	Old	
870.3150	Oral Subchronic – dog	00154795	Syngenta Crop Protection	Old	
870.3200	21/28-Day Dermal - rabbit	44333802	Syngenta Crop Protection	Old	
870.3465	4 week Inhalation Toxicity	41387702	Syngenta Crop Protection	Old	

Signature	2 11/11	San-10	Name and Title	Date
	former M Wa	ignir_	James M. Wagner, Agent for Extremis, LLC	December 20, 2016

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EPA Reg No./ File Symbol: 91127-U	Page 5 of 10
Product: EXT Lambda-Cyhalothrin TGAI	
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3700a	Developmental Toxicity - rat	00154800	Syngenta Crop Protection	Old	
870.3700b	Developmental Toxicity - rabbit	00154801	Syngenta Crop Protection	Old	
870.3800	Reproduction - rat	00154802	Syngenta Crop Protection	Old	-
870.4100b	Chronic Toxicity - dog	40027902	Syngenta Crop Protection	Old	3
870.4200a	Carcinogenicity - rat	00154803	Syngenta Crop Protection	Old	
870.4200Ь	Carcinogenicity - mouse	00150842	Syngenta Crop Protection	Old	
870.4300	Combined Chronic/Carcinogenicity -rat	00154803	Syngenta Crop Protection	Old	
870.5100	Mutagenicity Bacterial Reverse Mutation	00154796	Syngenta Crop Protection	Old	1
870.5300	Mutagenicity-In Vitro Mammalian Cell Gene Mutation	00154797	Syngenta Crop Protection	Old	
870.5375	Mutagenicity—Structural Chromosomal Aberrations	00154798	Syngenta Crop Protection	Old	
870.5395	Mammalian Micronucleus Mouse	00154799	Syngenta Crop Protection	Old	
870.6200a	Acute Neurotoxicity Screening Battery	44861510	Syngenta Crop Protection	Old	
870.6200b	Subchronic Neurotoxicity Screening Battery	45689101	Syngenta Crop Protection	Old	
870.6300	Developmental Neurotoxicity (rat)	46449102	Syngenta Crop Protection	Old	-
870.7485	General Metabolism - rat	00151116 00150852 00150852 00153036 00153037	Syngenta Crop Protection	Old	
870.7485	Metabolism and Pharmacokinetics - dog	00150843 00150852	Syngenta Crop Protection	Old	
870.7600	Dermal Penetration	44990402	Syngenta Crop Protection	Old	-
870.7800	Immunotoxicity		-22-0	Gap	Footnote 3.

Signature James M Wagner	Name and Title James M. Wagner, Agent for Extremis, LLC	Date December 206 2016
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U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

Date: December 20, 2016		EPA Reg No./ File Symbol: 91127-U	Page 6 of 10
Applicant's/Registrant's Name and Address:	Extremis, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: EXT Lambda-Cyhalothrin TGAl	

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2100	Transferable Foliar Residues	44964401 44984402 44990401	Syngenta Crop Protection	Old	
860.1850	Confined Accumulation in Rotational Crops	N/A	Syngenta Crop Protection	Old	Footnote 2.
860.1300	Nature of Residue - crops	40027904 40027905 40052402 40052403 40307102 41463001 41726202	Syngenta Crop Protection	Old	
860.1300	Nature of Residue - Poultry	40027906 40027907 41737002	Syngenta Crop Protection	Old	
860.1300	Nature of Residue - Cow/Goat	41144901 41144903 41614608	Syngenta Crop Protection	Old	
860.1340	Analytical Method - Animal Tissues	40027907 40054002 40260901 40260902 42253702	Syngenta Crop Protection	Old	
860.1340	Analytical Method - Crops	40054001 41614603 41614604	Syngenta Crop Protection	Old	

Signature On MI Illeance	Name and Title	Date
Comes M Wagner	James M. Wagner, Agent for Extremis, LLC	December 20, 2016



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1360	Multiresidue Analytical Method	40446102 41737005 42172302 42172303	Syngenta Crop Protection	Old	
860.1380	Storage Stability Data - crops	40027910 40027911 41614602 42919201 43032001 43781003	Syngenta Crop Protection	Old	
860.1380	Storage Stability Data – animal tissues and milk	40027912 40027913 40027915 40446103	Syngenta Crop Protection	Old	
860.1480	Meat/Poultry/Eggs	40027914 42311201	Syngenta Crop Protection	Old	

Signature James M Wagner	Name and Title James M. Wagner, Agent for Extremis, LLC	Date December 20, 2016
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Date: December 20, 2016 Applicant's/Registrant's Name and Address: Extremis, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 EPA Reg No./File Symbol: 91127-U Page 8 of 10 EXT Lambda-Cyhalothrin TGAI

860.1500	Crop Field Trials	40027909	Syngenta Crop Protection	Old
		40307103	1	7.7
		40307104		
		40307105		
		40307106		
		41737003		
		41737006		1 1
		41737007		
		41771102		1 1
		41863902		
		41892402	1	
		41934604		
		42206803		
		42253703		
		42273202		
		42274001		
		43296302		
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		43781002		
		44075501		
		44075502		
		44325702		
		44325703		
		44325704		
		44325705		
		44325706		
		44325707		
		44325708		

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Signature	Comes MI Warner	Name and Title	Date
	James M Wagner	James M. Wagner, Agent for Extremis, LLC	December 30, 2016
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Date: December 20, 2016		EPA Reg No./ File Symbol: 91127-U	Page 9 of 10
Applicant's/Registrant's Name and Address:	Extremis, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: EXT Lambda-Cyhalothrin TGAI	

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		44325709			
		44325710			
		44325712			
		44595108			
		45007001			
		45007003			
		45007004			
		45007005	1		
		45007006			
		45007008			
		45007009			
		45007010			
		45007011			
		45032401			
860,1500	Crops Field Trials	45443101	Syngenta Crop Protection	Pay	
		45443102			
		45669201			
		46658301			
		46665301			
		46665302			
		46665303			
		46665304			
		46665305			
860.1520	Processed Food/Feed	45443103	Syngenta Crop Protection	Pay	
		45443104	- Kanada anaka sasanan	- ",	
		45443105			

James M Wagner James	M. Wagner, Agent for Extremis, LLC	December 20, 2016





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Date: December 20, 2016		EPA Reg No./ File Symbol: 91127-U	Page 10 of 10
Applicant's/Registrant's Name and Address:	Extremis, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: EXT Lambda-Cyhalothrin TGA1	

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Subpart K · Human Exposure (Series 875)	Applicator Exposure and Post application Exposure Data	CITE ALL	Ag Handlers Exposure Task Force Ag Reentry Exposure Task Force	Pay	
Subpart L - Spray Drift	Spray Drift Data	CITE ALL	Spray Drift Task Force	Old	

Footnotes:

- 1. No data can be located in NPIRS and EPA has not required the data in GDCI 128897-2013.
- 2. Confined crop rotation Old EPA reviews reference this data but do not provide the MRID number.
- 3. Reference: EPA GDC! 128897-1249-2013

Signature James M Wagner_	Name and Title James M. Wagner, Agent for Extremis, LLC	Date December 20, 2016
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

February 5, 2016

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

OPP Decision Number: D-513542

EPA File Symbol or Registration Number: 91127-U Product Name: EXT Lambda-Cyhalothrin TGAI

EPA Receipt Date: 20-Jan-2016 EPA Company Number: 91127 Company Name: EXTREMIS, LLC

JAMES WAGNER
WAGNER REGULATORY ASSOCIATES, INC.
EXTREMIS, LLC
P.O. BOX 640
HOCKESSIN, DE 19707

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R334

NEW PRODUCT; MUP OR END USE PRODUCT WITH UNREGISTERED SOURCE OF THE ACTIVE INGREDIENT; REQUIRES SCIENCE DATA REVIEW; NEW PHYSICAL FORM; SELECTIVE DATA CITATION;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

2120

Front End Processing Staff

Information Technology & Resources Management Division

From:

notification@pay.gov

To: Subject: Brooke Hedrick

Pay.gov Payment Confirmation: PRIA Service Fees

Date:

Wednesday, January 20, 2016 8:40:28 AM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or yanchulis.michael@epa.gov.

Application Name: PRIA Service Fees Pay.gov Tracking ID: 25PFTIM4 Agency Tracking ID: 74944340314

Transaction Type: Sale

Transaction Date: 01/20/2016 08:40:15 AM EST

Account Holder Name: Brooke Hedrick

Transaction Amount: \$19,838.00

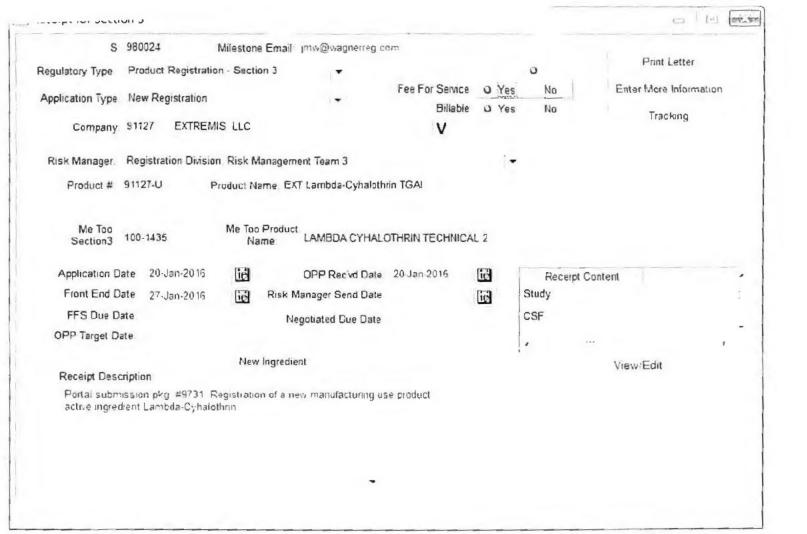
Card Type: Visa

Card Number: *********4032

Registration Number:

Company Name: Extremis, LLC Company Number: 91127 Action Code: R334

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Fee for Service

{980024v~

This package includes the following	for Division
New RegistrationAmendment	○ AD ○ BPPD ○ RD
Studies?□ Fee Waiver?□ volpay% Reduction:	Risk Mgr. 3
Receipt No. S-	980024
EPA File Symbol/Reg. No.	91127-U
Pin-Punch Date:	1/20/2016
This item is NOT subject	to FFS action.
Action Code:	Parent/Child Decisions:
Requested:	
Amount Due: \$	
Inert Cleared for Intended Use	Uncleared Inert in Product
Reviewer:	Date:
Remarks:	ins we have
will code	
electronic 11	

PRIA 3 – 21 Day Content Screen Review Worksheet

21 D Expe Divi	(EPA/OPP Use Only) September 2012 Pay Screen Start Date: 1-20-16 Perts In-Processing Signature: B.B. Date 2- sion management contacted on issues No Yes	5-16 Date	Fee F	Paid: Y	es V	/
EPA	Reg. Number: 9/127-U EPA Receipt Date: /-	20-16	;			
	Items for Review			Yes	No	N/A
1	Application Form (EPA Form 8570-1) signed & complete including	ding pack	kage	X		
,	Confidential Statement of Formula all boxes completed, form s dated (EPA Form 8570-4)	signed, a	nd	X		
2	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570 completed and signed (N/A if 100% repack)	0-34)		X		
				,		

	19pc			1		
2	Confidential Statement of Formula all boxes completed, form s dated (EPA Form 8570-4)	signed, a	nd	X		
4	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570 completed and signed (N/A if 100% repack)	0-34)		X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no	34		
	If applicable, is there a letter of Authorization for exclusive use or	nly.				
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)					
5	a) Selective Method (Fee category experts use)	yes	no		K W	
3	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					والمنافعة والمستادة
6	5 Copies of <u>Label</u> (<u>Electronic labels on CD</u> are encouraged and available)	d guidar	ice is	X		
7	Is the data package consistent with PR Notice 86-5			X		
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, reduced risk rationale		X
	Required Data and/or data waivers. See Footnote C.		
ë	a) List study (or studies) not included with application		
10		:	
10			
Comr	nents:		
	+ Macumentation: Pass Altrice		
	- Repursed tomo en complete		
	* Irents: Park Fret		
	- no trent to review		
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	- correction on the viry 2-11-16		
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460ND



Office of Pesticide Programs

Registration Division (7505P)

09/28/2016

MEMORANDUM-

Similarity Determination

Subject: Name of Pesticide Product: EXT Lambda Cyhalothrin TGAI

EPA File Symbol: 91127-U
DP Barcode: 431993
Decision No.: 513542
Action Code: R334

PC Code: 128897

From: Masih Hashim, Team Leader-Toxicology
Through: John C. Redden, M.S., Senior Assessor

Chemistry, Inerts, Toxicology Assessment Branch (CITAB)

Registration Division (7505P)

To: Kable Davis, RM 03

Invertebrate and Vertebrate Branch 1

Registration Division (7505P)

Applicant: Extremis, LLC

Hockessin, DE 19707

FORMULATION FROM LABEL:

Active Ingredient(s):		% by wt
Lambda-cyhalothrin		98.82
Inerts/impurities:		1.18
	Total:	100.0

ACTION REQUESTED /BACKGROUND: The PM is asking for the registration of #91127-U through a similarity using #100-1435 as the cited product. Both products have the same active ingredient, Lambda cyhalothrin.

RECOMMENDATIONS: The cited and the proposed products are substantially similar. The data can be bridged between them. We have revised the dermal irritation category from III to II in the cited product due to some details that were not followed in the laboratory testing for the cited product. We have thus removed Supplementary, so that this product may be used for citation.

The acute toxicity profile for EXT Lambda-Cyhalothrin TGAl is as follows:

Acute oral toxicity	III	cited-acceptable	MRID 48601003
Acute dermal toxicity	II	cited-acceptable	MRID 48601004
Acute inhalation toxicity	п	cited- acceptable	MRID 48601005
Primary eye irritation	Ш	cited-acceptable	MRID 48601006
Primary dermal irritation	П*	cited-acceptable*	MRID 48601007
Dermal sensitization	negative	cited-acceptable	MRID 48601008

Based on the toxicity profile, the revised signal word is WARING. Registrant has an option to use Danger, signal word for the Product (as shown in the label).

The basic CSF (dated 1-20-2016) for the proposed product should be approved by the Product Chemistry Team (CITAB).

For Manufacturing use only

PRODUCT ID #: 091127-00004

PRODUCT NAME: EXT Lambda Cyhalothrin TGAI

PRECAUTIONARY STATEMENTS

SIGNAL WORD: WARNING

SPANISH SIGNAL WORD: AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Hazards to Humans and Domestic Animals:

May be fatal if absorbed through skin. May be fatal if inhaled. Causes skin irritation. Harmful if swallowed. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wear long-sleeved shirt and long pants, socks,

^{*}Downgraded to Category II.

chemical-resistant footwear, and gloves. Remove and wash contaminated clothing before reuse. Do not breathe spray mist. Avoid contact with eyes, skin or clothing. Wear protective eyewear (as appropriate).

For handling activities, it is recommended to use a non-powered air purifying respirator (such as equipped with an N-, R- or P-series filter).

Follow the manufacturer\'s instructions for cleaning/maintaining PPE. If no such instructions for washables, then use detergent and hot water. Keep and wash PPE separately from other laundry. When mixing and loading a chemical resistant apron is recommended.

First Aid:

If on skin:

- -Take off contaminated clothing.
- -Rinse skin immediately with plenty of water for 15-20 minutes.
- -Call a poison control center or doctor for treatment advice.

If inhaled:

- -Move the person to fresh air.
- -If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- -Call a poison control center or doctor for further treatment advice.

If swallowed:

- -Call a poison control center or doctor immediately for treatment advice.
- -Have person sip a glass of water if able to swallow.
- -Do not induce vomiting unless told to by a poison control center or doctor.
- -Do not give anything to an unconscious person.

If in eyes:

- -Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

The following statements are suggested types of information that may be included, if applicable: - technical information on symptomatology; - use of supportive treatments to maintain life functions; - medicine that will counteract the specific physiological effects of the pesticide; - company telephone number to specific medical personnel who can provide specialized medical advice.

USER SAFETY RECOMMENDATIONS: User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, change into clean clothing.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

BARCODE No.: <u>D431994</u> FILE SYMBOL No: <u>91127-U: PRODUCT NAME</u>: EXT Lambda - Cyhalothrin Technical: DECISION No.: 513542: PC Code(s): 128897; ACTION CODE: R334; FOOD Use: Yes COMPANY: Extremis LLC

This Document Contains Confidential Information

DATE OUT:

08/25/2016

SUBJECT:

Technical Product Chemistry Review

Product Name: EXT Lambda - Cyhalothrin Technical

Indira Gairola / Product Chemistry Team

FROM:

CITAB/RD (7505P)

TO:

Maggie Rudick / Kable Davis RM 03

I-V Branch 1 / RD (7505P)

INTRODUCTION:

Registrant is submitting registration application for subject product EXT Lambda Cyhalothrin Technical produced by Applicant is submitting Basic CSF dated 01/20/16 and MRID #s 498125-01 to -17 for product chemistry Group A and Group B data to support this application CITAB (Chemistry Team) has been asked to determine the acceptability of the aforementioned subject product chemistry data and Basic CSF 01/20/16.

SUMMARY OF FINDINGS:

1. Group A guidelines: 830.1550 (Product identity & composition) MRID #498125-01. Data for the identity and position of the product were provided. The active ingredient "Lambda-Cyhalothrin" is present at a nominal concentration of 98.82%. The product chemistry data submitted corresponding to Guideline \$30.1550 satisfy the data requirements of 40CFR§158.320.

830.1600 (Description of materials used to produce the product) MRID #498125-01. The registrant provided a list of suppliers and MSDSs for the materials used to produce the product. The product chemistry data submitted corresponding to Guideline 830.1600 satisfy the data requirements of 40CFR §158.325.

830,1620 (Description of production process) 498533-01. The production process by was described by The product chemistry data submitted corresponding to Guideline 830.1620 satisfy the data requirements of 40CFR§ 158.330.

Product ingredient source information may be entitled to confidential treatment 1 | Page

BARCODE No.: <u>D431994</u> FILE SYMBOL No: <u>91127-U:</u> PRODUCT NAME: EXT Lambda Cyhalothrin Technical: <u>DECISION No.:</u> <u>513542</u>: <u>PC Code(s)</u>: <u>128897</u>; <u>ACTION CODE</u>: <u>R334</u>; <u>FOOD Use</u>: Yes COMPANY: Extremis LLC

830.1670 (Discussion on the formation of impurities). 498125-03 &-06. A discussion of the origin and mechanism formation for the impurities in the product was provided. Applicant provided analyses of all process related impurities.

The Analysis was performed using

was detected. External standard quantitation

methods were used to quantify the levels of a.i Lambda - Cyhalothrin, and associated impurities. As per CITAB based on the estimated impurity value the impurity is not of significant potential toxicological concern.

Data submitted corresponding to Guideline 830.1670 satisfy the data requirements of 40CFR§158.340.

830.1700 (Preliminary analysis) #498125-03. Results of a five-batch preliminary analysis were provided in. The total recovery content of a.i. ranged from 98.6-99.8%. These values are within the certified limits specified on the CSF dated 01/20/16 The product chemistry data submitted corresponding to Guideline 830.1700 satisfy the data requirements of 40CFR§158.345.

830.1750 (Certified limits) for Basic CSF dated 01/20/16. Certified limits were provided for the active ingredient Lambda - Cyhalothrin, and upper certified limits were provided for the impurities in the product. Content of a.i. ranged from 95.86% -100% with an average of 98.82%. The proposed upper limit is 100 % and the lower limit is 95.86%. The product chemistry data submitted corresponding to Guideline 830.1750 satisfy the data requirements of 40CFR§158.350

830.1800 (Enforcement analytical method) MRID #498125-06. A description of the enforcement analytical method and its validation were provided.

The product chemistry data submitted corresponding to Guideline 830.1800 satisfy the data requirements of 40CFR §158.355.

For details please refer to the Confidential Appendix

2. Group B guidelines (physical-chemical properties) The Data submitted is listed in the following pages.

BARCODE No.: <u>D431994</u> FILE SYMBOL No: <u>91127-U:</u> PRODUCT NAME: EXT Lambda Cyhalothrin Technical: <u>DECISION No.:</u> <u>513542</u>: <u>PC Code(s)</u>: <u>128897</u>; <u>ACTION CODE</u>: <u>R334</u>; <u>FOOD Use</u>: Yes COMPANY: Extremis LLC

CONCLUSIONS:

The (CITAB/ Product Chemistry Team has reviewed the product chemistry data submitted for EXT Lambda-Cyhalothrin Technical" and concluded:

- 1. All product chemistry data submitted for guideline 830 Series group A are acceptable.
- 2. The Basic dated CSF 01/20/16 is acceptable.
- No impurity of significant toxicological concern was identified as per CITAB, for details please refer to the Confidential Appendix and summary of findings.
- Product chemistry data corresponding to 830 series group B (physical-Chemical properties) are listed in the following pages.

BARCODE No.: <u>D431994</u> FILE SYMBOL No: <u>91127-U</u>: PRODUCT NAME: EXT Lambda Cyhalothrin Technical: <u>DECISION No.</u>: <u>513542</u>: <u>PC Code(s)</u>: <u>128897</u>; <u>ACTION CODE</u>: <u>R334</u>; <u>FOOD Use</u>: Yes COMPANY: Extremis LLC

IDENTITY

Lambda-cyhalothrin, an insecticide for use in agricultural crops. Capacity of Lambda-cyhalothrin TC is 2,000MT per year, and three shifts work each day, with purity of min. 98%. The empirical formula for Lambda-cyhalothrin is C₂₃H₁₉ClF₃NO₃, it is also identified by CAS Registry Number 91465-08-6. The structure formula for Lambda-cyhalothrin is:

BARCODE No.: <u>D431994</u> FILE SYMBOL No: <u>91127-U: PRODUCT NAME</u>: EXT Lambda Cyhalothrin Technical: <u>DECISION No.:</u> <u>513542</u>: <u>PC Code(s)</u>: <u>128897</u>; <u>ACTION CODE</u>: <u>R334</u>; <u>FOOD Use</u>: Yes COMPANY: Extremis LLC

GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	498125-07	Δ	White
830,6303	Physical state	498125-07		Powder
830.6304	Odor	498125-07	Α	Characteristic
830,6313	Stability to normal and elevated temperatures, metals, and metal ions	498125-17	A	This solid TGAI product will not be packaged in metal containers neither will it be stored at temperatures >122F. Further this product melts at 123F and does not decompose but boils at 572F.
830.6314	Oxidation/reduction: chemical incompatibility	498125-08 - 17	A	Does not contain exidizing or reducing agents
830.6315	Flammability	498125-17	w	This solid product is a TGAl and will not self-ignite no is it highly flammable.
830.6316	Explodability	498125-17	w	This solid product is a TGAl and does not have the potential to explode; therefore it is requested that the requirement for this data be waived.
830 6317	Storage stability	498125-17	ĵ	LLC agrees to conduct and submit it as a condition of product registration. Therefore it is requested that the Agency make this data a condition of registration
830.6319	Miscibility		<u>NA</u>	Not an emulsifiable liquid to be diluted with petroleum solvent therefore it is not required.
830 6320	Corrosion characteristics	498125-17	Α	This TGAI product is a powder and is not corrosive.
830 7000	<u>pH</u>	498125-09	A	4.9. (1% soln.) @ 20 °C
830,7050	UV/Visible absorption	498125-10	Δ	See Note 1 below:
830.7100	Viscosity		NA	Solid
830.7200	Melting point	498125-11	A	Lambda-Cyhalothrin Technical sample melts from 50.7°C to 52.1°C, without concurrent decomposition
830 7220	Boiling point	1	NA	Solid
830.7300	Density	498125-13	A	1.2941 g/mL at 20°C; 1.2941 relative density
830.7550	Octanol / water Partition coefficient	498125-14	Δ	Mean log Pow 5.85, Mean Pow 708042.66. See Note 2 below:
830.7950	Vapor pressure	498125-16	Δ	the value for the vapor pressure of 2.37 10 -5 Pa, was calculated as 1.20 Pa x m3 x mol -1 at 20°C.
	Water solubility	498125-15	Α	solubility of the test item in water was lower than 10-2 g/l.

BARCODE No.: D431994 FILE SYMBOL No: 91127-U: PRODUCT NAME: EXT Lambda Cyhalothrin Technical: DECISION No.: 513542: PC Code(s): 128897; ACTION CODE: R334; FOOD Use: Yes COMPANY: Extremis LLC

Note 1

From the UV Vis spectroscopic characterisation, it can be concluded that all obtained da are in agreement with the Lambda-Cyhalothiin Technical molecular structure.

Since the Lambda-cyhalothrin has not acidic functional groups the absorption should not b influenced by acidification or alkalinisation The diverse spectrum obtained in basic condition respect to the acidic and neutral condition

is due to the hydrolyzation of the molecule.

The obtained molar absorption coefficient E for the Lambeth-Cynalothrin Technical arnummarised in the following table.

λ maximum	E molar at	bsorption coefficient (L/mol · cm ')	
(nm)	Neutral (pH-6)	Acid (pH<2)	Basic (pH>10
205	-14866	51854	
221			
		and the second of the second o	33609
278	2017	2227	
305			
-			1780
λ	E molar absorption coefficient (L-mot - cm)		
(nm)	Neutral (pH-6)	Acid (pH<2)	Basic (pH>10)
290	431		(pristo)
	701	664	1124
295		131	1383

This wavelength is not a test item maximum wavelength but the absorption is measured at this wavelength as recommended in the Commission Regulation Et it kin

Note 2

TABLE 2c Calculation of the Pow value for the test item: mean c both isomers

Mean log Pow	5.85
Mean Pow	708042.66

BARCODE No.: <u>D431994</u> FILE SYMBOL No: <u>91127-U:</u> PRODUCT NAME: EXT Lambda Cyhalothrin Technical: <u>DECISION No.:</u> <u>513542</u>: PC Code(s): <u>128897</u>; ACTION CODE: R334; FOOD Use: Yes COMPANY: Extremis LLC

CONFIDENTIAL APPENDIX









UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DP BARCODE No.: D431994; FILE SYMBOL No.: 91127-U (screen); PRODUCT NAME: EXT Lambda-Cyhalothrin Technical; DECISION No.:513542; PC Code(s): 128897; ACTION CODE: R334; FOOD Use:

DATE OUT: March 7, 2016

SUBJECT: 45/90 day screen results for technical product "EXT Lambda-Cyhalothrin Technical"

FROM: Shyam Mathur,

Product Chemistry Team Leader

CITAB/RD (7505P)

TO: Maggie Rudick / Kable Davis, RM 03

I-V Branch 1 / RD (7505P)

Company Name:

Extremis LLC

Active Ingredient(s): Lambda-Cyhalothrin (98.82%)

MRID No(s).: 49812501 to 49812517

CONCLUSION:

Deficiencies: No

(if there are deficiencies they are indicated below each heading as Note 1, Note 2 Etc)

Group A: All data submitted

Group B: All data submitted

CSF: Basic CSF (dated 01-20-2016) submitted

DRAFT PRODUCT LABEL: Submitted

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to the author of this report the corrected deficiencies in response to 10 day letter. The corrected deficiencies will be attached to the original bean, if the data package is still in CITAB. New Bean is required in case the bean has been closed by CITAB. Thank you.

Ciarlo, Timothy

From:

James Wagner < jmw@wagnerreg.com>

Sent:

Tuesday, December 20, 2016 10:20 AM Resubmission # 3

To:

Ciarlo, Timothy: Kt Woodall

Cc:

Davis, Kable; IVB1

Subject:

RE: 91127-U Proposed Label

Attachments:

Certification Citation of Data Form 8570-34 (rev 12-20-2016).pdf; Data Matrix EPA

Internal (rev 12-20-2016).pdf; Data Matrix EPA Public (rev 12-20-2016).pdf

Follow Up Flag:

Follow up

Flag Status:

Completed

Hi Tim,

I have revised the matrix (public & internal) with acute tox mrids, todays date and reg. file no, attached. Also attached is the certification form 8570-34 with today's date and reg. file no. Thanks for all your help with this submission.

Do you anticipate that this registration may be approved sometime this week?

Thanks again,

Jim Wagner Regulatory Consultant Tel: (302) 635-7290 Mobile: (302) 530-5745

From: Ciarlo, Timothy [mailto:Ciarlo.Timothy@epa.gov]

Sent: Tuesday, December 20, 2016 9:37 AM

To: Kt Woodall ktwoodall@wagnerreg.com

Cc: James Wagner <jmw@wagnerreg.com>; Davis, Kable <Davis.Kable@epa.gov>; IVB1 <IVB1@epa.gov>

Subject: RE: 91127-U Proposed Label

Hi Kt,

Please see the acute tox review, attached. If you have any questions, please let me know.

FYI, the label you sent yesterday looks good to my eyes. All we need to finish this one up is the revised data matrix and Certification with Respect to Citation of Data form.

Thanks,

Tim Ciarlo
Entomologist
Environmental Protection Agency
OCSPP/OPP/RD/IVB1

Email: Ciarlo. Timothy@epa.gov

Phone: 703-347-8082

From: Kt Woodall [mailto:ktwoodall@wagnerreg.com]

Sent: Tuesday, December 20, 2016 9:17 AM
To: Ciarlo, Timothy < Ciarlo, Timothy@epa.gov>

Cc: James Wagner < jmw@wagnerreg.com>; Davis, Kable < Davis.Kable@epa.gov>; IVB1 < IVB1@epa.gov>

Subject: RE: 91127-U Proposed Label

Importance: High

Hi Tim - Could you forward us the acute tox review? Thanks!

Kt Woodall

Wagner Regulatory Associates, Inc. 7217 Lancaster Pike, Suite A Hockessin, DE 19707 KtWoodall@wagnerreg.com

From: Ciarlo, Timothy [mailto:Ciarlo.Timothy@epa.gov]

Sent: Friday, December 16, 2016 3:25 PM
To: Kt Woodall ktwoodall@wagnerreg.com

Cc: James Wagner < imw@wagnerreg.com>; Davis, Kable < Davis.Kable@epa.gov>; IVB1 < IVB1@epa.gov>

Subject: RE: 91127-U Proposed Label

Hi Kt,

Thanks for the revised label. We noticed a few additional items to be addressed that were not caught in our initial label comments, which are based on the acute toxicity profile for this proposed product. Please see the attached PDF for details. If you have any questions, please let me know.

Also, the data matrix dated 1/20/2016 does not list the correct acute tox MRIDs to satisfy the following guidelines. You can find these on page 4 of the current data matrix:

870.1100

870.1200

870.1300

870.2400

870.2500

870.2600

Please send me a revised data matrix with the correct MRIDs listed. If you'd like, I'd be happy to send you the acute tox review. Just let me know. Please also note that the date on the Certification with Respect to Citation of Data form 8570-34 should align with the date on the data matrix.

Regards,

Tim Ciarlo
Entomologist
Environmental Protection Agency
OCSPP/OPP/RD/IVB1

Email: Ciarlo.Timothy@epa.gov

Phone: 703-347-8082

Phone: 703-347-8082

From: Kt Woodall [mailto:ktwoodall@wagnerreg.com]

Sent: Tuesday, December 06, 2016 7:54 AM Resubmission # 1

To: Ciarlo, Timothy < <u>Ciarlo.Timothy@epa.gov</u>>
Cc: James Wagner < <u>imw@wagnerreg.com</u>>
Subject: RE: 91127-U Proposed Label

Good morning Tim - Please see the attached. Thanks for all your help!

Kt Woodall

Wagner Regulatory Associates, Inc. 7217 Lancaster Pike, Suite A Hockessin, DE 19707 KtWoodall@wagnerreg.com

From: Ciarlo, Timothy [mailto:Ciarlo.Timothy@epa.gov]

Sent: Friday, December 02, 2016 3:03 PM
To: James Wagner < jmw@wagnerreg.com

Cc: Davis, Kable <Davis.Kable@epa.gov>; IVB1 <IVB1@epa.gov>

Subject: 91127-U Proposed Label

Hi James.

I've conducted an initial review of the proposed label for 91127-U and have a few relatively minor comments. Please see the attached file for specific comments and respond back with a revised label when you can. If you would like to see the chemistry and/or toxicology reviews on which these comments are based, just let me know and I'd be happy to send them separately. Please let me know if you have any questions or concerns.

Have a nice weekend.

Regards,

Tim Ciarlo
Entomologist
Environmental Protection Agency
OCSPP/OPP/RD/IVB1
Email: Ciarlo.Timothy@epa.gov

Phone: 703-347-8082

Ciarlo, Timothy

From:

Kt Woodall < ktwoodall@wagnerreg.com>

Sent:

Monday, December 19, 2016 10:36 AM Resubmission # 2

To:

Ciarlo, Timothy-

Cc:

James Wagner; Davis, Kable; IVB1 RE: 91127-U Proposed Label

Subject: Attachments:

91127.xxxxx.20160120.V3 - Clean.pdf; 91127.xxxxx.20160120.V3 - Highlighted.pdf

Good morning Tim - Please see the attached label with edits. I'll have the forms back to you by this afternoon. Thanks!

Kt Woodall

Wagner Regulatory Associates, Inc. 7217 Lancaster Pike, Surte A Hockessin, DE 19707 KtWoodall@wagnerreg.com

From: Ciarlo, Timothy [mailto:Ciarlo.Timothy@epa.gov]

Sent: Friday, December 16, 2016 3:25 PM To: Kt Woodall < ktwoodall@wagnerreg.com>

Cc: James Wagner < jmw@wagnerreg.com>; Davis, Kable < Davis.Kable@epa.gov>; IVB1 < IVB1@epa.gov>

Subject: RE: 91127-U Proposed Label

Hi Kt,

Thanks for the revised label. We noticed a few additional items to be addressed that were not caught in our initial label comments, which are based on the acute toxicity profile for this proposed product. Please see the attached PDF for details. If you have any questions, please let me know.

Also, the data matrix dated 1/20/2016 does not list the correct acute tox MRIDs to satisfy the following guidelines. You can find these on page 4 of the current data matrix:

870.1100

870,1200

870.1300

870.2400

870.2500

870.2600

Please send me a revised data matrix with the correct MRIDs listed. If you'd like, I'd be happy to send you the acute tox review. Just let me know. Please also note that the date on the Certification with Respect to Citation of Data form 8570-34 should align with the date on the data matrix.

Regards,

Tim Ciarlo Entomologist **Environmental Protection Agency** OCSPP/OPP/RD/IVB1

Email: Ciarlo. Timothy@epa.gov

